114824

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Lackawanna Refuse Superfund Site DATE: 11-8-91

FROM: Fran Burns
Superfund Remedial Branch

TO: Thomas Voltaggio, Director
Hazardous Waste Management Division

Peter Schaul, Chief
Superfund Remedial Branch

The remedial action for the Lackawanna Refuse Superfund Site is complete except for the final decision for the treatment of the leachate from the site. EPA and the Pennsylvania Department of Environmental Resources developed a strategy for the leachate, which was to apply for a discharge permit from the Lower Lackawanna Valley Sanitary Authority (LLSVA) to discharge the leachate in the sanitary sewer. LLVSA set unrealistic pretreatment limits for the leachate that were based in part on a PADER-issued draft NPDES permit that used incorrect parameters. PADER issued a revised draft NPDES permit in August 1991 with revised discharge parameters that have required LLVSA to adjust the pretreatment limits. Mr. Tom Harrison of LLVSA stated that the Authority in a meeting on November 4, 1991 was prepared to respond to PADER's revised draft NPDES permit and would be developing revised pretreatment limits.

The latest analysis of the leachate from August 1990 (copy attached) shows a small amount of volatile organic contamination, xylene at 6 ppb (MCL 10,000 ppb), and several semi-volatile organics, Di-n-Butylphthalate at 1 ppb, bis(2-Ethylhexyl) Phthalate at 8 ppb, Di-n-Octyl Phthalate at 1 ppb (there are no MCL for the semi-volatiles). The inorganics in the sample are aluminum at .75 ppm, calcium at 68.6 ppm, copper at 0.01 ppm, iron at 13.7 ppm, magnesium at 30.3 ppm, manganese at 3.34 ppm, potassium at 9.86 ppm, sodium at 16.0 ppm, and zinc at 0.06 ppm. Based on the results EPA feels that the levels of contamination are low enough to discharge directly into the sewer system without treatment. The design of a pretreatment plant would be difficult as there is insufficient contamination to establish a level of treatment.

In our discussion with PADER, the State has applied the requirements of the State Municipal Landfill Regulations, specifically the need for a 250,000 gallon storage tank for the leachate prior to discharge to the sanitary system. EPA agrees

that a storage tank is needed but feels that the PADER requirements are inconsistent with the situation and result in an overdesigned storage tank. The U.S. Corps of Engineers' (USACE) preliminary cost estimate for a tank that meets all of the State requirements is $429,000. EPA and the UASCE attended a meeting with the State in May 1991 to request PADER to review their regulations and determine if the regulations were applicable as the landfill was closed prior to 1980 and if the regulations were applicable to review their requirements for the tank in an attempt to reduce the cost of the storage tank. PADER responded by letter dated July 8, 1991 (copy enclosed) that included additional requirements for the storage tank.

PADER appears to be creating a situation through the strict application of the Municipal Landfill Regulations that forces EPA to reject design parameters that are clearly unnecessary and inappropriate. EPA will be perceived by the public of attempting to circumvent the environmental regulations of the State.

The present strategy is to wait until December, 1991 for discharge approval of LLVSA and if disapproved proceed with the construction of an onsite treatment plant that both EPA and PADER have been attempting to avoid.